

4TH JUDICIAL DIST.
16 DEC 29 PM 2:46
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4 IN THE CIRCUIT COURT OF THE STATE OF OREGON
5 FOR THE COUNTY OF MULTNOMAH

6 **PROVIDENCE HEALTH &**
7 **SERVICES-OREGON**, an Oregon
8 nonprofit corporation, dba Providence
Portland Medical Center,

9 Plaintiff,

10 vs.

11 **SANJANA PAHALAD MANCUSO**,
12 personal representative of the Estate of
Rattan Kumar Pahalad, in her official and
personal capacities,

13 Defendant.

14 Case No. 16CV38474

15 **MOTION FOR CHANGE OF JUDGE**

16 Plaintiff moves the court for an order disqualifying the Honorable Jerome E.
17 LaBarre from presiding over this case and assigning another judge to do so.

18 Counsel for the parties received electronic notification of Judge LaBarre's
19 assignment as motions judge on December 28, 2016.

20 Plaintiff's counsel has conferred with defendant's counsel, Maret Thatcher Smith,
21 and she does not oppose this motion. Plaintiff's counsel has hand delivered a copy of this
22 motion and supporting affidavit to Judge LaBarre's chambers.

23 This motion is made pursuant to ORS 14.250 to 14.270 and is supported by the
24 attached affidavit of counsel.

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1 DATED this 29th day of December, 2016.

2 HARRANG LONG GARY RUDNICK P.C.

3 By: Susan Marmaduke
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Of Attorneys for Plaintiff

10 Trial Attorney: Arden J. Olson

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CERTIFICATE OF SERVICE

I certify that on December 29, 2016, I served or caused to be served a true and complete copy of the foregoing **MOTION FOR CHANGE OF JUDGE** on the party or parties listed below as follows:

- Via the Court's Efilng System
- Via First Class Mail, Postage Prepaid
- Via Email
- Via Personal Delivery

Maret Thatcher Smith
maret@thatchersmithlaw.com
Thatcher Smith Law
107 SE Washington St. Ste 255
Portland, OR 97214

Of Attorneys for Defendant

I further certify that on December 29, 2016, I caused a true and correct copy of this proposed **MOTION FOR CHANGE OF JUDGE** to be served by hand delivery to The Honorable Jerome LaBarre's chambers.

HARRANG LONG GARY RUDNICK P.C.

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